

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
BIG STONE GAP DIVISION**

The Clinch Coalition, et al.,)	Case No. 2:21-cv-0003-JPJ-PMS
)	
Plaintiffs,)	
)	
v.)	MOTION TO PERMIT SARA
)	GHAFOURI TO APPEAR <i>PRO HAC</i>
)	<i>VICE</i>
The United States Forest Service, et al.,)	
)	
Defendants,)	
)	
and)	
)	
American Forest Resource Council,)	
Federal Forest Resource Coalition, and)	
American Loggers Council,)	
)	
Intervenor-Defendants.)	

Defendant-intervenors American Forest Resource Council et al., by and through their attorney of record, Jay C. Johnson, respectfully move for permission for Sara Ghafouri to appear *pro hac vice* in this matter in compliance with W.D. Va. Gen. R. 6(d). Ms. Ghafouri is an attorney in the office of the American Forest Resource Council located at 700 N.E. Multnomah, Suite 320, Portland, OR 97232. Her e-mail address is sghafouri@amforest.org and her telephone number is (503) 222-9505. Ms. Ghafouri is not a resident of this district and does not have an office in this district for the practice of law.

Ms. Ghafouri is not qualified and licensed to practice under the laws of Virginia. However, she is qualified and licensed to practice before the Supreme Court of Oregon (OSB #111021), United States Courts of Appeals for the Ninth Circuit and District of

Columbia Circuit, and the United States District Court for the District of Oregon and remains in good standing in all such courts.

Ms. Ghafouri has not previously applied for admission *pro hac vice* in this Court. This admissions *pro hac vice* is only for the conduct of this case in which Ms. Ghafouri is associated and which is now pending before the Court.

Attached is a Proposed Order admitting Ms. Ghafouri to appear and sign pleadings in this case *pro hac vice* as counsel for Defendant-Intervenors.

Respectfully submitted this 23rd day of July, 2021.

By: /s/ Jay C. Johnson
Jay C. Johnson
Virginia Bar #47009
VENABLE LLP
600 Massachusetts Avenue, NW
Washington, DC 20001
jcjohnson@venable.com
(202) 344-4000
(202) 344-8300 (fax)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was served via CM/ECF system to the parties of record on this 23rd day of July, 2021.

/s/ Jay C. Johnson
Jay C. Johnson